

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W.R. GRACE & CO., <i>et al.</i>)	Case No. 01-01139 (JFK)
)	
Debtors.)	(Jointly Administered)
)	
)	Hearing Date: December 5, 2006
)	Objection Deadline: November 28, 2006

**OPPOSITION TO DEBTORS' MOTION TO COMPEL ASBESTOS PERSONAL
INJURY CLAIMANTS REPRESENTED BY THORNTON & NAUMES LLP TO
RESPOND TO THE W.R. GRACE PERSONAL INJURY QUESTIONNAIRE**

NOW COME certain asbestos personal injury claimants (each, a "Claimant") in receipt of the "W.R. Grace Asbestos Personal Injury Questionnaire," (hereinafter, "Questionnaire"), by and through their counsel, Thornton & Naumes, LLP, and hereby oppose the Debtors' *second* Motion to compel asbestos personal injury claimants to respond to the questionnaire because the bulk of debtors' motion is moot as debtors based their motion to compel on an earlier version of Claimants' completed questionnaires, and, contrary to the Debtors' assertions, the objections contained in Claimants' supplemented questionnaires are valid and necessary.

WHEREFORE Claimants respectfully requests that this Court deny Debtors' Motion to compel asbestos personal injury claimants to respond to the W.R. Grace Personal Injury Questionnaire.

Dated: November 27, 2006

Respectfully submitted,

/s/ Daniel K. Hogan
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